



Paducah Citizens Advisory Board

"working for the future"

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Recommendation 13-03: Recycling

June 18, 2013

Background

The Paducah Citizens Advisory Board (CAB) wishes to thank the U. S. Department of Energy (DOE) for taking action toward lifting the moratorium on unrestricted use of non-contaminated metals and equipment from radiological areas. This action, which would preserve metals that would otherwise be treated as waste, demonstrates DOE's commitment to achieving waste reduction and cost efficient waste management.

The EM Site Specific Advisory Board (SSAB) and the Paducah Citizens Advisory Board have long advocated recycling and reuse of excess metals and materials by the DOE as an environmentally responsible method for the DOE to deal with waste, as well as preserve national assets. We believe it is in the national interest to preserve America's finite resources through recycling and reuse.

There are vast amounts of contaminated, high quality nickel and other metals that should be reclaimed when the Paducah Gaseous Diffusion Plant (PGDP) enrichment facility moves to decontamination and decommissioning (D&D). The PGDP cascade is made up of several components such as compressors and converters, along with miles of associated piping. These components are constructed of monel, copper, nickel-plated steel, aluminum, and other valuable materials. If these components are treated as waste, they will consume volumes of space in a disposal cell. In cases where the technology is not currently available for decontamination, the materials should be stored onsite.

Alternately, an option for disposition of volumetrically contaminated assets could be restricted reuse of the reclaimed assets by DOE-authorized nuclear facilities, the commercial nuclear industry, or Nuclear Regulatory Commission (NRC) licensees authorized to possess the material. Nickel currently stored at Paducah and Oak Ridge, along with the volumes which will be generated during the D&D of the PGDP could be used in this manner and still be compliant with the moratorium of January 12, 2000, which prohibits free-release of contaminated scrap metals.

The Paducah CAB feels that DOE made the right decision in researching and publishing the *Programmatic Environmental Assessment for the Recycle of Scrap Metals Originating from Radiological Areas (DRAFT)*. Responsible stewardship of government resources by recycling, reclamation, and reuse will help preserve the precious natural resources of this nation for future generations and our national security. The CAB looks forward to seeing the results of the year long trial of the carbonyl process recently authorized at Portsmouth.

Recommendation

The CAB recommends that a comprehensive and structured recycling program be established at Paducah. This action offers the following benefits:

- **Potential for recovery of many hundreds of tons of valuable materials and components that are of value to the nation's economy.**
- **Generation of significant revenue to both DOE and the local economy in a manner already being utilized at other sites across the country.**
- **Reduction in volumes of waste that must otherwise be buried at an on-site landfill, or transported to a remote landfill.**

The CAB further recommends that materials for which adequate certification for approved cleanup procedures has not yet been developed be stored on-site pending development of approved techniques.